

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Rosemary Spell
Title: Executive Director

REQUEST: Joint Parties' First Set of Discovery

DATED: December 23, 2003

ITEM: Joint Parties 1-2 For each Verizon wire center in Massachusetts, please provide the total number of currently active loops, by type listed below, in electronic spreadsheet form (i.e., as an Excel Spreadsheet), provisioned to CLECs:

- a. UNE analog loop (residential);
- b. UNE analog loop (business);
- c. UNE DS-1 loop;
- d. Analog special access;
- e. DS-1 special access;
- f. UNE-P (residential);
- g. UNE-P (business);
- h. ADSL loop (residential);
- i. ADSL loop (business);
- j. DS-3 loop;
- k. Other.

REPLY: Verizon MA objects to parts (d), (e), (h), (i) and (k) of this Information Request on the grounds that these questions seek information that is not relevant to the triggers analyses at issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Information regarding Verizon MA's special access services or ADSL services is beyond the scope of the analyses at issue in the Department's review of Verizon MA's triggers cases. Without waiving its objections, Verizon MA responds to the other parts of this Information Request as follows:

Please see the attached file (Attachment MA JP 1-2), which provides data responsive to parts (a)-(c), (f)-(g) and (j), as of

June 30, 2003. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.

VZ # 207

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Rosemary Spell
Title: Executive Director

REQUEST: Joint Parties' First Set of Discovery

DATED: December 23, 2003

ITEM: Joint Parties 1-5 Provide the number of EEL local connections, in DS-1 equivalents, by Verizon wire center in Massachusetts for each month since the fourth quarter of 1999.

REPLY: Verizon MA objects to this Information Request on the grounds that it is overbroad, unduly burdensome, and/or seeks information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, Verizon MA responds as follows:

Please see the attached file (Attachment MA JP 1-5) that contains data as of June 30, 2003. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.

VZ # 210

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Rosemary Spell
Title: Executive Director

REQUEST: Joint Parties' First Set of Discovery

DATED: December 23, 2003

ITEM: Joint Parties 1-6 Provide the number of EELs in service in Massachusetts at the end of the most recent quarter for which such information is available, stated separately for:

- a. EELs comprised of analog loops that are connected to analog transport;
- b. EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport;
- c. EELs comprised of DS-1 loops that are connected to DS-1 transport;
- d. EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport.

REPLY: The information requested is not readily available and would require a burdensome special study that would entail an extensive manual review. Please see the attached file (Attachment MA JP 1-6) that contains data for the loop portion of EELs in service as of June 30, 2003. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.

